

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

Case No. 1:23-cv-9440-JHR

David Bradberry,

Plaintiff,

vs.

Abercrombie & Fitch Co., Michael S.
Jeffries, Matthew Smith, and The Jeffries
Family Office, LLC,

Defendants.

NOTICE OF MOTION TO DISMISS AMENDED COMPLAINT
ON BEHALF OF MICHAEL S. JEFFRIES'

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, Defendant Michael S. Jeffries, will move this Court before the Honorable Jennifer H. Rearden, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., New York, New York 10007-1312, at a time and place to be set by the Court, for an order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing all claims against him set forth in the Amended Complaint [ECF No. 82] filed by Plaintiff David Bradberry in this action, together with such other and further relief as this Court may deem just and proper.

Dated: October 4, 2024

Respectfully submitted,

**NELSON MULLINS
RILEY & SCARBOROUGH**
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